

1 LEON DAYAN (State Bar No. 153162)  
2 ABIGAIL V. CARTER\*  
3 RAMYA RAVINDRAN\*  
4 LANE M. SHADGETT\*  
5 J. ALEXANDER ROWELL\*  
6 **BREDHOFF & KAISER P.L.L.C.**  
7 805 Fifteenth Street NW, Suite 1000  
8 Washington, DC 20005  
Telephone: (202) 842-2600  
Facsimile: (202) 842-1888  
ldayan@bredhoff.com  
acarter@bredhoff.com  
rravindran@bredhoff.com  
lshadgett@bredhoff.com  
arowell@bredhoff.com  
\*Application *pro hac vice* forthcoming

10 Daniel Feinberg, SBN 135983  
Catha Worthman, SBN 230399  
11 Anne Weis, SBN 336480  
**FEINBERG, JACKSON, WORTHMAN  
& WASOW, LLP**  
12 2030 Addison Street, Suite 500  
Berkeley, CA 94704  
13 Tel. (510) 269-7998  
Fax (510) 269-7994  
14 [dan@feinbergjackson.com](mailto:dan@feinbergjackson.com)  
[catha@feinbergjackson.com](mailto:catha@feinbergjackson.com)  
15 [anne@feinbergjackson.com](mailto:anne@feinbergjackson.com)

16 | *Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF  
21 GOVERNMENT EMPLOYEES, AFL-CIO, et  
al.

Case No.: 3:25-cv-03070-JD

Plaintiffs,

## **DECLARATION OF ASHAKI ROBINSON**

24 DONALD J. TRUMP, in his official capacity as  
25 President of the United States, et al.

## Defendants

## DECLARATION OF ASHAKI ROBINSON

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am a Social Science Analyst at the Department of Housing and Urban Development (“HUD” or “Agency”). I have worked at HUD for 18 years. In my role, I conduct research, data analysis, and policy development related to housing and urban issues.

3. I am the Regional Vice President of the American Federation of Government Employees (“AFGE”) National Council of HUD Locals Council 222 (“Council 222”). I have served as Regional Vice President intermittently since 2011. I am also the President of AFGE Local 476 (“Local 476” or “Union”) and have served in that capacity intermittently since 2012.

4. The central purpose of HUD is to create strong, sustainable, inclusive communities and quality affordable homes for all, focusing on expanding homeownership, increasing access to affordable housing, and fighting housing discrimination.

5. Council 222 is the exclusive representative of approximately 4,750 bargaining unit employees at HUD. There are approximately 2,900 dues-paying members in Council 222.

6. Of those workers, Local 476 represents approximately 1,700 bargaining unit employees. Of those employees, 1,529 are dues-paying members. The majority of the employees work in the Washington, D.C. metropolitan area.

7. There are 136 bargaining unit employees in the Office of the Chief Information Officer (“OCIO”) in Council 222. Of those workers, approximately 100 are in the Washington D.C. metropolitan region and are bargaining unit employees of Local 476.

8. These employees' positions include GS 2210 IT Specialist and IT Project Manager; GS 0343 Management Analyst; GS 0301 Management Information Specialist; GS 0560 Budget Analyst; and GS 110 Contracting Officer.

9. I am familiar with the position description of all these employees and nothing in their position description implicates national security interests.

10. A GS 2210 IT Specialist generally: provides technical support, diagnosing and

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2 resolving recurring IT issues reported by customers; installs, configures, and troubleshoots  
3 hardware and software components; and maintains problem tracking systems and delivers  
4 customer training on IT policies and procedures.

5 11. A GS 2210 IT Project Manager generally: manages IT projects supporting HUD's  
6 mission, including operations and development initiatives; oversees contractor tasks, validates  
7 deliverables, and supports acquisition efforts; develops project plans, allocates resources, and  
8 ensures completion of contractual obligations.

9 12. A GS 0343 Management Analyst generally: acts as a liaison with Congressional  
10 staff, state/local officials, and HUD stakeholders; coordinates briefings, resolves cross-program  
11 issues, and assesses community needs; and conducts analytical research and prepares reports to  
12 improve program effectiveness.

13 13. A GS 0301 Management Information Specialist generally: focuses on managing  
14 HUD's information systems to support decision-making processes; and ensures data accuracy,  
15 facilitates reporting, and enhances communication across departments.

16 14. A GS 0560 Budget Analyst generally: develops and monitors budgets for HUD  
17 programs; provides financial analysis to ensure compliance with regulations; and advises  
18 management on budgetary strategies to optimize resource allocation.

19 15. A GS 110 Contracting Officer generally: oversees procurement processes for  
20 goods and services required by HUD; and negotiates contracts, ensures compliance with federal  
21 regulations, and manages vendor relationships.

22 16. I have never known any of the employees in these positions to perform any duties  
23 involving national security, so it surprised me to learn that the Executive Order deemed  
24 collective bargaining on behalf of employees in the OCIO a threat to national security.

25 17. The March 27, 2025, Executive Order titled "Exclusions from Federal Labor  
26 Management Relations Programs" ("Executive Order") covers the OCIO employees in Local  
27 476's bargaining unit. In addition, the Executive Order allows the head of HUD to eliminate  
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2 collective bargaining if he determines any subdivision has as a primary function intelligence,  
3 counterintelligence, investigative or national security work.

4 18. Council 222's and Local 476's mission is to advocate for and promote the  
5 interests of bargaining unit employees in their federal employment, including working for a safe  
6 and fair workplace for all employees. As the exclusive bargaining representative of these  
7 workers, the unions provide many services to all bargaining unit employees. Core functions of  
8 Council 222 and Local 476 include collective bargaining with the Agency to obtain a fair and  
9 reasonable collective bargaining agreement ("CBA"); filing and negotiating grievances against  
10 the Agency to enforce the terms and conditions of the CBA; pursuing arbitrations on behalf of  
11 workers to enforce the CBA; and providing other support, guidance, and resources to bargaining  
12 unit employees.

13 19. The Executive Order will have an immediate adverse effect on the unions'  
14 abilities to provide these services to employees in OCIO. The Order will also have an immediate  
15 adverse impact on workers in the bargaining unit.

16 20. If Council 222 is no longer the exclusive bargaining representative of the  
17 bargaining unit employees in OCIO, the union cannot enforce the CBA against the Agency for  
18 these employees. The CBA, which is effective from December 2024 through July 2029, provides  
19 important rights and protections to OCIO employees. For instance, the CBA:

- 20 a. Sets terms and conditions for working hours, overtime, sick leave, holidays, and  
21 paid time off for workers in the unit.
- 22 b. Imposes safety and health requirements to ensure the welfare of workers in their  
23 place of employment.
- 24 c. Establishes protections for workers regarding reduction-in-force ("RIF") actions  
25 and procedures.
- 26 d. Imposes procedures for and limitations on disciplinary and adverse actions against  
27 workers.



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- 2 e. Provides for an Employee Assistance Program for individuals who have problems
- 3 associated with alcohol, drug, marital, family, legal, financial, stress, attendance,
- 4 and other personal concerns.
- 5 f. Provides for remote work and telework arrangements.
- 6 g. Establishes grievance and arbitration procedures for employees and the Union to
- 7 resolve disputes with the Agency over employment matters.
- 8 h. Provides for official time, which allows bargaining unit employees to perform
- 9 union representation activities during certain amounts of time the employee
- 10 otherwise would be in a duty status, without loss of pay or charge to annual leave.

11 Without the unions representing the OCIO employees and enforcing the CBA, the  
12 employees will not have the benefit of those rights and protections going forward. I understand  
13 that the Agency is also likely to rescind the CBA under the Executive Order, which will deprive  
14 Council 222 of the binding contract that it negotiated.

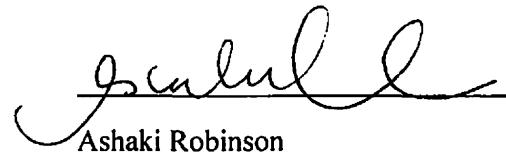
15 21. As a result of the Executive Order, future grievances, and arbitrations to vindicate  
16 the rights of the OCIO employees under the CBA will be left unresolved. Currently, Council 222  
17 has an outstanding grievance against HUD for cancelling the telework agreements of bargaining  
18 unit employees, including those employed in the OCIO.

19 22. If Union officers can no longer make use of official time due to the Executive  
20 Order, it will be impossible for the Union to fulfill its representational duties. Union officers  
21 must participate in meetings with management and with employees that necessarily occur during  
22 work hours. Requiring officials to take leave to participate in these meetings be unworkable.

23 23. The Executive Order is chilling workers' speech and activity. I have personally  
24 experienced that, without the safeguards provided by the CBA and union representation,  
25 employees may hesitate to voice concerns about workplace conditions to the Agency. Moreover,  
26 since this Executive Order specifically impacts federal unions and their employees, I hesitate to  
27 openly criticize the administration or express political opinions that may be contrary to its stance,

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2 out of concern for potential repercussions. Based on my conversations with other federal  
3 employees, I know that many share similar apprehensions.

4 I declare under penalty of perjury under the laws of the United States that the foregoing is  
5 true and correct. Executed April 1, 2025, in Washington, D.C.

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7  
8 Ashaki Robinson